

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604-3590

Reply to the Attention Of: SR-6J

June 3, 2008

Via E-mail and Certified Mail

EPA Region 5 Records Ctr.



365904

Jennifer Hale
Weyerhaeuser Company
Environment Health & Safety, WTC 2G2
P.O. Box 9777
Federal Way, WA 98063-9777

RE: Remedial Design Workplan
12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04
Plainwell, Michigan

Dear Ms. Hale:

The United States Environmental Protection Agency (EPA) and Michigan Department of Environmental Quality (MDEQ) have reviewed RMT's April 24, 2008 response to EPA's comments on the Remedial Design Workplan (RDWP) for *12th Street Landfill, Kalamazoo River Superfund Site Operable Unit #04, Plainwell, Michigan*, dated February 21, 2008. Though EPA would like clarification on select issues, EPA grants conditional approval of the RDWP at this time. This conditional approval is on the condition that Weyerhaeuser or their representatives make the following revisions. After these revisions are made, please submit a final version of the RDWP that includes the appropriate changes based upon our comments.

General Comments

The general comments were addressed.

Specific Comments

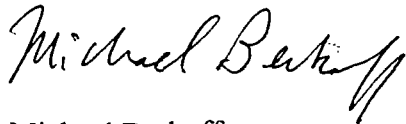
1. In your latest revision, it is unclear if a habitat evaluation is planned or necessary and what fieldwork will be performed to acquire the information. At this point in time, EPA does not require Weyerhaeuser to complete a habitat evaluation. Please modify your text to state that Weyerhaeuser will not be nor is required to conduct a habitat evaluation at the present time.

2. Decontamination waste can not be disposed of at the 12th Street Landfill. EPA addresses this in the April 24, 2008 comment letter (comment 17 and comment 2 on the Multi Area FSP). Weyerhaeuser has not provided any information identifying where this practice has been allowed in the past and no analytical data is available to support the assumption that the practice does not pose risk. Discharging decontamination water to the landfill surface is not typically a standard practice at Superfund sites and is inconsistent with previous plans submitted for this site.
- On page 3 of 5 of the Geotechnical Investigation Data Quality Objectives and Work Scope submitted by RMT on May 11, 2007, the following was indicated: "Dispose Geoprobe® samples on-site. Decontamination water will be containerized in 55-gallon barrels that will be properly labeled and stored on site."
 - In addition, Revision 1 of the Draft Multi-Area Field Sampling Plan prepared for OU-4: Emergency Action at the 12th Street Landfill Former Powerhouse Discharge Channel indicated on page 11 that "Decontamination water that is generated after the treatment system is unavailable will be characterized to identify appropriate methods of off-site treatment and/or disposal. The water samples will be analyzed for the analytes required by the treatment and/or disposal facility."

The decontamination water will be characterized and collected in containers that will be shipped off site to appropriate disposal facilities. Please make the necessary changes to the Workplan so that decontamination activities at the 12th Street Landfill will be in keeping with EPA Superfund procedures.

If you have any questions about these comments, please contact me at (312) 353-8983.

Sincerely,



Michael Berkoff
Remedial Project Manager

cc: J.Saric EPA
M. Mankowski EPA
E. Furey EPA
S. Chummar EPA
P.Bucholtz MDEQ
K. Huibregste RMT
I. Hicken RMT